

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

PALMCO ADMINISTRATION, LLC

Petitioner,

v.

FLOWER PAYMENT, INC. (F/K/A FLOWER
POWER, INC. and FLOWER POWER CO.
LTD. JAPAN A/K/A FLOWER DENRYOKY
KABUSHIKI KAISHA)

Respondent.

Civil Action No.

**NOTICE OF PETITION TO CONFIRM FINAL ARBITRATION AWARD
AND FOR ENTRY OF JUDGMENT**

PLEASE TAKE NOTICE that upon the Petition of Petitioner Palmco Administration, LLC (“Palmco”) dated August 21, 2023, the Declaration of Robert Palmese executed on August 18, 2023 and all exhibits thereto, and upon all prior proceedings herein, Palmco will move this Court, at the United States Courthouse located at 500 Pearl Street, New York, New York 10007, at a date and time to be determined by the Court, for an Order pursuant to Chapter 2 of the Federal Arbitration Act (“FAA”), 9 U.S.C. §§ 201 *et seq.* and Article III of the United Nations Convention on the Recognition and Enforcement of Foreign Arbitral Awards, June 10, 1958, 330 U.N.T.S. 38, (a) confirming a non-domestic arbitral award dated December 9, 2022 in favor of Petitioner, in an arbitration conducted through the International Centre for Dispute Resolution, International Arbitration Tribunal (the “Final Award”), (b) directing the Clerk to enter final judgment thereon against Respondent Flower Payment, Inc. (f/k/a Flower Power, Inc. and Flower Power, Co. Ltd. Japan a/k/a Flower Denryoky Kabushiki Kaisha) in the amount of \$2,711,807.71, plus interest in the amount of US\$541.38 per day from December 10, 2022 to the

date of payment in full of the Final Award, (c) granting Palmco its reasonable costs of collection and enforcement of the Final Award (including Palmco's reasonable attorney's fees, costs and expenses in connection with this proceeding); and (d) granting Palmco such other and further relief as the Court deems just and proper.

Dated: New York, New York
August 21, 2023

Respectfully Submitted,

HUNTON ANDREWS KURTH LLP

By: /s/ Torsten M. Kracht
Torsten M. Kracht
Silvia N. Ostrower
200 Park Avenue, 52nd Floor
New York, New York 10166-0005
212-309-1000
tkracht@HuntonAK.com
sostrower@HuntonAK.com

*Attorneys for Petitioner
Palmco Administration, LLC*